

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANTON PERAIRE-BUENO, and JAMES
PERAIRE-BUENO,

Defendants.

Case No.: 1:24-cr-00293-JGLC

[FILED PARTIALLY UNDER SEAL]

**DECLARATION OF KATHERINE TREFZ IN SUPPORT OF DEFENDANTS'
MOTIONS TO DISMISS; MOTION TO COMPEL PRODUCTION OF *BRADY*
MATERIAL; MOTION FOR A BILL OF PARTICULARS; AND MOTION TO
SUPPRESS OR, IN THE ALTERNATIVE, FOR *FRANKS* HEARING**

I, Katherine A. Trefz, declare as follows:

1. I am a partner at Williams & Connolly LLP, counsel to Defendant James Peraire-Bueno in the above-captioned action. I am over eighteen years of age and am competent to testify herein. I make the following statements based on my personal knowledge.

2. I make this declaration in support of Defendants' joint initial motions, namely: (a) their Motions to Dismiss the Indictment; (b) their Motion to Compel the Production of *Brady* Material; (c) their Motion to Suppress or, in the Alternative, for a *Franks* Hearing; and (d) their Motion for a Bill of Particulars.

3. Pursuant to Local Criminal Rule 16.1, I certify that the parties conferred via letter exchange regarding the requests at issue in the defendants' *Brady* motion and Motion for Bill of Particulars, as described in paragraphs 4-8 of this declaration.

4. Attached as Exhibit 1 is a true and correct copy of a letter from me to counsel for the government dated July 16, 2024, setting forth specific requests pursuant to Federal Rule of Criminal Procedure 16 and *Brady* and its progeny.

5. Attached as Exhibit 2 is a true and correct copy of a letter from me to counsel for the government dated September 26, 2024, reiterating certain *Brady* requests.

6. Attached as Exhibit 3 is a true and correct copy of a letter from me to counsel for the government dated September 26, 2024, regarding requests for Bills of Particulars.

7. Attached as Exhibit 4 is a true and correct copy of a letter from counsel for the government to me dated October 11, 2024, regarding certain *Brady* requests.

8. Attached as Exhibit 5 is a true and correct copy of a letter from counsel for the government to me dated October 11, 2024, regarding the requests for a Bill of Particulars.

9. Attached as Exhibit 6 is a document produced by the government bearing the Bates stamp USAO_00014425. According to the government, this document was voluntarily produced to it by [REDACTED].

10. Attached as Exhibit 7 is an excerpt of a document produced by the government bearing the Bates stamp USAO_00014587 through -14588. The full document is [REDACTED]

11. Attached as Exhibit 8 is a copy of the search warrant affidavit submitted by IRS Agent Marco Dias dated January 5, 2024 in support of a search warrant to Google, LLC. It bears Bates stamp USAO_00000066 through -120.

12. Attached as Exhibit 9 is a copy of the search warrant affidavit submitted by IRS Agent Marco Dias dated January 30, 2024 in support of a search warrant to Google, LLC. It bears Bates stamp USAO_0000183 through -263.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

EXECUTED on this 6th day of December, 2024 in Seattle, Washington.

By: /s/ Katherine Trefz

Katherine Trefz

CERTIFICATE OF SERVICE

I hereby certify that on December 6, 2024, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record in this matter who are on the CM/ECF system.

/s/ Katherine Trefz
Katherine Trefz